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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JANET GARCIA, GLADYS ZEPEDA,  
MIRIAM ZAMORA, ALI EL-BEY,  
PETER DIOCSON JR, MARQUIS  
ASHLEY, JAMES HAUGABROOK,  
individuals, KTOWN FOR ALL, an  
unincorporated association;  
ASSOCIATION FOR RESPONSIBLE  
AND EQUITABLE PUBLIC  
SPENDING, an unincorporated  
association

Plaintiff(s),

vs.

CITY OF LOS ANGELES, a municipal  
entity; DOES 1-7,  
Defendant(s).

CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF NICHOLAS  
PRICE**

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19 *and Equitable Public Spending, and Janet Garcia.*  
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**DECLARATION OF NICHOLAS PRICE**

1  
2       1.     My name is Nicholas Price. I have personal knowledge of the  
3 facts contained in this declaration, and if called to testify, I could and would  
4 testify competently as to the truth of the facts in this declaration.

5       2.     I am the treasurer of Koreatown for All, one of the plaintiffs in  
6 this case. I have been in the organization since its formation.

7       3.     Around 10:00am on February 24, 2020, I was on my way to a  
8 meeting with three people to talk about the Bridge Home Shelter that was  
9 being built in the neighborhood. I got a call from a neighbor who lives in  
10 Koreatown and knows our work. He notified me that Sanitation was  
11 conducting a clean-up at 4th and Vermont that would impact one of the  
12 unhoused residents that our organization serves, Kahn. He resides on Shatto  
13 Place in between 4th Street and 6th Street. His shelter is typically set up on  
14 the grassy parkway between the sidewalk and the street.

15       4.     Kahn is in a wheelchair. He is one of the residents our  
16 organization serves. We have worked with him for as long as we have been  
17 formed.

18       5.     When we heard about the sweep, another Ktown for All  
19 member, Nic Emmons, and I immediately went to Shatto Place to assist  
20 Kahn. We arrived at Shatto Place around 10:15am. We met the three people  
21 I was supposed to meet, and instead of talking about the Bridge Home  
22 Shelter in Koreatown, we monitored the sweep.

23       6.     When we arrived at Shatto Place, Sanitation employees were  
24 conducting a cleanup on 4th Street, west of Shatto Place. Kahn and the  
25 person who called us started packing up Kahn's belongings to move them  
26 out of the way of the cleanup. When we got there, we began helping to pack  
27 up Kahn's belongings.

1           7.     About five minutes after we arrived at Shatto Place, two LAPD  
2 officers and around 6 or 7 Sanitation employees arrived on Shatto Place. I  
3 saw the name tags on the LAPD officers' uniforms, which identified the two  
4 of them as Officer Lucero and Officer Kim. The sanitation workers were  
5 wearing white with yellow reflective vests saying "CARE".

6           8.     When the sanitation workers arrived, they began picking up  
7 items that were still on the ground. Officer Lucero told us we needed to  
8 leave the area.

9           9.     The neighbor who called us asked the city workers for more  
10 time for Kahn to finish packing up his belongings but the LAPD officer said  
11 no. The neighbor then asked if he could move some of Kahn's items out of  
12 the area, and Nic asked if he could carry the pallets out of the area. The  
13 Sanitation workers said no, that Kahn's items were bulky items and they  
14 couldn't take them. The sanitation worker also told us that Kahn could take  
15 only what would fit within a 60 gallon trash bag.

16          10.    The other people at the cleanup also tried to convince the city  
17 workers to let Kahn take more of his belongings, but the LAPD officers told  
18 us to leave. I tried to explain that Kahn was in a wheelchair and he needed  
19 more time, but they would not give him more time. The sanitation worker  
20 told us again said that some of Kahn's belongings were bulky items that  
21 would not fit in a 60 gallon container. He pointed to the pallets and a foam  
22 cushion that Kahn uses to sleep on. The foam cushion was about 2 inches  
23 thick and covered in fabric. It was pliable. We had intended to roll it up and  
24 move it out of the way, but the sanitation worker told us that it was too large  
25 because it couldn't fit in the 60 gallon container, and that was the law.

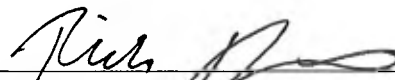
26          11.    Nic, who was videotaping the interaction, tried to reason with  
27 the sanitation worker to convince him to let Kahn keep some of his  
28 belongings. The sanitation workers would not let Kahn keep any of his

1 bulky items, but the sanitation worker then told us that we could pack up  
2 Kahn's smaller belongings in two coolers that Kahn had with him. While  
3 we were putting items into the coolers, Sanitation began throwing away the  
4 belongings that Sanitation identified as "bulky items," including the foam  
5 cushion and the three pallets that Kahn uses to keep himself off of the  
6 ground.

7 12. Officers Kim and Lucero again began demanding that we leave.  
8 We moved about ten feet away from the cleanup area. The sanitation  
9 workers threw away everything that was left in the area and then left.

10  
11 I declare under penalty of perjury that the foregoing is true and correct.

12  
13 Executed on February 24, 2020 in Los Angeles, California

14  
15   
16 Nicholas Price